

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

Plaintiffs,

vs.

NO. 5:21-cv-844-XR

GREGORY W. ABBOTT, et al.,

Defendants.

OCA-GREATER HOUSTON, et al.,

Plaintiffs,

vs.

NO. 1:21-cv-780-XR

JOHN SCOTT, et al.,

Defendants.

HOUSTON JUSTICE, et al.

Plaintiffs,

vs.

NO. 5:21-cv-848-XR

GREGORY WAYNE ABBOTT, et al.

Defendants.

LULAC TEXAS, et al.

Plaintiffs,

vs.

NO. 1:21-cv-786-XR

JOHN SCOTT, et al.

Defendants.

MI FAMILIA VOTA, et al.

Plaintiffs,

vs.

NO. 5:21-cv-0920-XR

GREG ABBOTT, et al.

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NO. 5:21-cv-1085-XR

THE STATE OF TEXAS, et al.

Defendants.

MI FAMILIA VOTA PLAINTIFFS' EXPERT DESIGNATIONS

Plaintiffs Mi Familia Vota, Marla Lopez, Marlon Lopez, and Paul Rutledge (collectively, "Plaintiffs") by and through undersigned counsel, hereby submit their Initial Expert Designation Pursuant to Federal Rule of Civil Procedure 26(a)(2) and the Court's Scheduling Order (Dkt. 125), as amended by the Stipulated Extension of Expert Discovery Deadline (Dkt. 209).

Plaintiffs designate the following expert witnesses:

Eric McDaniel, Ph.D.

Department of Government
1 University Station A1800
Austin, TX 78712

Christian R. Grose, Ph.D.

497 W. Avenue 44
Los Angeles, CA 90065

Franita Tolson, J.D.

Vice Dean for Faculty and Academic Affairs

Professor of Law

Professor of Political Science and International Relations (Courtesy)

USC Gould School of Law

699 W. Exposition Blvd.

Los Angeles, CA 90089

Dr. McDaniel, Dr. Grose, and Professor Tolson will testify regarding the matters and opinions contained in their expert reports, including amendments and supplements, if any. Dr. McDaniel, Dr. Grose, and Professor Tolson were retained by Plaintiffs to provide expert testimony and may be contacted through undersigned counsel. Copies of their reports were sent to all counsel on February 28, 2022.

Discovery is ongoing in this matter and Plaintiffs reserve the right to designate additional expert witnesses for the purpose of addressing, responding to, and/or rebutting Defendants' claims, and/or to address information obtained during discovery.

Further, Plaintiffs reserve the right to supplement and/or amend these designations in compliance with the Federal Rules of Civil Procedure, Court Order, and/or agreement between the parties.

Plaintiffs reserve the right to designate additional experts as allowed by Court Order, the Federal Rules of Civil Procedure, and/or any agreement between the parties. Plaintiffs reserve the right to de-designate any experts and/or to classify them as consulting experts in accordance with the Federal Rules of Civil Procedure and governing case law.

DATED: March 1, 2022

Respectfully submitted,

LYONS & LYONS, P.C.
237 W. Travis Street, Suite 100
San Antonio, Texas 78205
Telephone: (210) 225-5251
Telefax: (210) 225-6545

By: /s/ Elijah M. Watkins

Sean Lyons
State Bar No. 00792280
Sean@lyonsandlyons.com
Clem Lyons
State Bar No. 12742000
Clem@lyonsandlyons.com

Wendy J. Olson (*Pro hac vice*)
Laura E. Rosenbaum (*Pro hac vice*)
Marc Rasich (*Pro hac vice*)
Elijah Watkins (*Pro hac vice*)
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205

Courtney Hostetler (*Pro hac vice*)
Ron Fein (*Pro hac vice*)
John Bonifaz (*Pro hac vice*)
Ben Clements (*Pro hac vice*)
FREE SPEECH FOR PEOPLE
1320 Centre Street, Suite 405
Newton, MA 02459
(617) 249-3015
chostetler@freespeechforpeople.org
rfein@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bclements@freespeechforpeople.org

CERTIFICATE OF SERVICE

I certify that on March 1, 2022 a true and correct copy of the foregoing document was served in compliance with the Federal Rules of Civil Procedure upon the following via electronic mail:

Sean Lyons
Clem Lyons
Lyons & Lyons, P.C.
237 W. Travis St., Ste. 100
San Antonio, TX 78205
sean@lyonsandlyons.com
clem@lyonsandlyons.com

Courtney Hostetler
John Bonifaz
Ben Clements
Ron Fein
Free Speech for People
1320 Centre St., Ste. 405
Newton, MA 02459
chostetler@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bclements@freespeechforpeople.org
rfein@freespeechforpeople.org

Ken Paxton
Attorney General of Texas
Brent Webster
First Assistant Attorney General
Office of the Attorney General
P.O. Box 12548 (MC-009)
Austin, TX 78711-2548

Patrick K. Sweeten
Deputy Attorney General for Special
Litigation
patrick.sweeten@oag.texas.gov

William T. Thompson
Deputy Chief, Special Litigation Unit
will.thompson@oag.texas.gov

Eric A. Hudson
Senior Special Counsel
eric.hudson@oag.texas.gov

Kathleen T. Hunker
Special Counsel
kathleen.hunker@oag.texas.gov

Leif A. Olson
Special Counsel
leif.olson@oag.texas.gov

Jeffrey M. White
Special Counsel
jeff.white@oag.texas.gov

Jack B. DiSorbo
Assistant Attorney General
jack.disorbo@oag.texas.gov

/s/ Elijah M. Watkins
Elijah M. Watkins